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November 8, 2010

Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street
New York NY 10017

Re: Shepard, et al v. The Associated Press, et al
Docket no: 10 CV 7551 (RJS)

Dear Judge Sullivan:

In response to the letter dated October 29, 2010, of Andrew L. Deutsch, Esq, attorney for defendants, The Associated Press and "ESPN" in this action, it is respectfully requested that the plaintiffs be permitted to serve and attach copies of all registered copyrights, *nunc pro tunc*.

Counsel for plaintiffs has been advised by his clients that they are in possession of said copies of all registered copyrights and will provide them. Permitting a *nunc pro tunc* filing would serve justice and permit plaintiffs to receive due process.

It is respectfully requested that plaintiffs be afforded 45 days to obtain copies of all registered copyrights.

Additionally, it is plaintiffs' contention that the alleged copyright infringement is against all defendants. It is respectfully requested that plaintiffs be permitted to amend their complaint without leave of court.

Pursuant to this letter, plaintiffs' office will stipulate to extend the time to answer the complaint for all defendants for 45 days.

It should be noted that attorneys for the parties have had gainful negotiation discussions prior to the submission of this letter.

It is anticipated that during this time counsel for all parties will continue to participate in further settlement discussions in an effort to amicably resolve this matter without court intervention.

Thank you for your attention in this matter.

Very truly yours,

/s/

CHARLES C. DESTEFANO

CCD: lk

cc: Andrew L. Deutsch, Esq.

DLA Piper

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